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STATE OF HAWAI'I DEPARTMENT OF HAWAIIAN HOME LANDS

P.O. BOX 1879 HONOLULU, HAWAI'I 96805

July 28, 2009

MEMORANDUM

TO:

Henry Oliva, Deputy Director

Department of Human Services

ATTN:

Henrietta Gueso

MedQuest Division

FROM:

Viiceli A. Kane, Chairman

Hawaiian Homes Commission

SUBJECT:

Information Privacy and Security Council (IPSC) Reports on

Personal Information HRS 487N

The Department of Hawaiian Home Lands (DHL) encloses their report on personal information HRS 487N to the Information Privacy and Security Council (IPSC).

Should you have any questions, please contact DHHL's point of contact, Wanda Zablan at 620-9540. Mahalo!

Encl.

DEPARTMENT OF HAWAIIAN HOME LANDS REPORT TO THE INFORMATION PRIVACY AND SECURITY COUNCIL (IPSC)

The Department of Hawaiian Home Lands (DHHL) directs and carries out programs, projects, activities and services in accordance with policies established by the Hawaiian Homes Commission to serve the beneficiaries (individuals who have at least 50 percent Hawaiian blood) of the Hawaiian home lands trust by developing and delivering its lands.

The DHHL submits this report on the protection of an individual's social security number that is collected, used, and maintained by the department.

The DHHL Information Technology Staff implemented protective features applicable to accessing computer network files which:

- 1) limits access to social security numbers and other personal information to allow only programs who work with those applicant and lessee files;
- 2) limits and restricts the authorized staff who are able to access the applicant and beneficiary files;
- 3) requires username identification and personal password to access secured files;
- 4) requires password be regularly changed to ensure the accessed beneficiary information remains private and secure;
- 5) limits printed documents by redacting protected information to reveal only the last 4 digits of an individual's social security number for identification purposes.

DHHL beneficiaries' entire social security numbers and/or other personal information will continue to be secured in the above manner. If staff are required to view the applicant or lessee's full social security number or other personal information to ensure the identification of the applicant or lessee to establish benefits, particularly for individuals with the same surname but different suffix (i.e., Sr., Jr., III, etc.), the above security procedures are applicable to all restricted staff required to view this information as part of their job function.

If staff are required to print out documents which reveal a beneficiary's full social security number or other protected personal information, those printed documents are secured in a locked filed cabinet whose key is also secured in a locked drawer. Only authorized staff allowed to view these printed documents have access to the drawer and file cabinet keys.

In addition, the DHHL Information Technology Staff are currently working on converting an individual's social security number to a nine-digit applicant or lessee identification number (i.e., 000000001, 000000002, etc.) thereby eliminating the use of printing documents or viewing network screens that reveals the beneficiaries' entire social security number or other personal information to identify the applicant or lessee.

Applicants and/or beneficiaries must meet personally with an appropriate representative of the applicable DHHL office and provide photo identification in order for DHHL to disclose restricted personal information in their applicant and/or lessee file(s). At the end of each day, applicant and lessee files are returned to the file and secured and locked in a locked, restricted staff access only file room.

DHHL plans to reprogram and maintain its legacy systems with its existing staff. Estimated costs to upgrade the legacy systems that affect social security number is minimal with use of existing staff.